

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re: :  
: Chapter 7  
ORLY GINGER, :  
: Case No.: 19-13895 (JLG)  
Debtor. :  
: :  
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**DECLARATION OF DALIA GINGER**

DALIA GINGER, pursuant to 28 U.S.C. § 1746(2), declares as follows:

1. I am a creditor in the above-referenced action, and the plaintiff in the constructive trust action brought in connection with this case. *See* Adversary Proceeding # 20-01010-jlg. I am also the plaintiff in an action seeking to determine the discharge and/or dischargeability of the Debtor. [Dkt. No. 99]. I respectfully submit this declaration in support of the common interest privilege shared by parties and counsel for (a) myself, (b) my son, Sagi Genger, (c) the Trustee of the Orly Genger 1993 Trust, Michael Oldner, and our respective affiliated entities (collectively, the “Parties”).

2. I have reviewed the accompanying declaration of Sagi Genger [Dkt. No. 293-1] (“Sagi Declaration”), and hereby attest to this Court that it is correct and consistent with my understanding. In support of this Declaration, I hereby incorporate by reference all of the statements and assertions made in the Sagi Declaration, including those supporting a common interest privilege among the Parties and their counsel.

3. Neither I, nor any entity with which I am affiliated, consent to disclosure of any confidential common interest communications between or among the Parties and/or any of our respective counsel.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
July 10, 2020

/s/ *Dalia Genger*

DALIA GENDER